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after the husband's disappearance she instituted an action for the insurance. The association insisted that by bringing the action for divorce she had expressed her belief that her husband lived, and that after she had ceased payments on his certificate she was estopped to assert that he was dead. In *Butler v. Supreme Court I. O. F.*, 101 Pacific Reporter, 481, the Washington Supreme Court decided that the wife was not estopped to assert her husband's death within the two years following his disappearance, as the association could not have been injured by reason of her conduct.

Infringement of Copyrights by Moving Picture Machine.—In *Harper & Bro. et al. v. Kalem Co. et al.*, 169 Federal Reporter, 61, it appeared that defendant had employed a person to read *Ben Hur* and to write a description of it which might be utilized by a moving picture machine. The dramatization of this book had previously been copyrighted by the plaintiff. Defendant advertised the films thus taken as capable of producing a moving picture spectacle of *Ben Hur*, and sent its advertisement to the proprietors of theatricums. The United States Circuit Court of Appeals holds that when a film is put on an exhibiting machine which reproduces the action of the characters, it becomes a dramatization. Moving pictures are a form of expression infringing not the copyrighted book or drama, but the author's exclusive right to dramatize his writings, and to publicly perform such dramatization.

Publication of Portraits in Advertising.—The defendant's newspaper, in *Peck v. Tribune Company*, 29 Supreme Court Reporter, 554, published, in an advertisement of whisky, a portrait of plaintiff in connection with a signed statement purporting to have been made by her that she was a nurse, had used the whisky for herself and patients, and recommended it. In her suit for libel in publishing the portrait, plaintiff alleged that she was not the woman whose name was signed to the recommendation, that she was not a nurse, and was a total abstainer. It was suggested in defense that defendant published the portrait by mistake, and without knowledge that it was plaintiff's portrait, or was not what it purported to be. The court says that defendant took the risk in publishing the portrait, and the usual principles of tort make him liable if the representations are false. It could not be said that the obvious tendency of what was imputed to plaintiff by the advertisement was not to seriously hurt her standing with a considerable and respectable class of the community. The United States Supreme Court, reversing the decision of the lower court, concluded that plaintiff was entitled to have her case submitted to the jury.

Expenses of President of Corporation.—A corporation, after the expiration of the term of office of its president, sued him to recover a